

# Federal Defenders OF NEW YORK, INC.

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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/2/2022

David E. Patton  
Executive Director  
and Attorney-in-Chief

August 1, 2022

**BY ECF**

The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2210  
New York, NY 10007

**RE: United States v. Jian Li  
20 Cr. 568 (AT)**

Dear Judge Torres:

I write on behalf of all parties to respectfully request that the Court place the motion schedule currently in effect in this matter into abeyance for 90 days. The parties previously requested, and the Court set, a motion schedule in this matter, with the defense's opening motion due this Friday, August 5, 2022. *See* ECF No. 42.


Since requesting that schedule, the parties have been discussing a resolution to this matter. As part of this discussion, the parties request time for the defense to prepare and submit a mitigation package for the Government's consideration. Accordingly, the parties respectfully request that the Court hold the motion schedule set in this case in abeyance for 90 days, in order for the parties to complete discussion of a resolution.

Finally, the Government requests that time be excluded under the Speedy Trial Act until the new date the defense's opening motion is due. The defense consents to this request, with the caveat that it does not waive any future arguments that the speedy trial "clock" in this case has already expired.

GRANTED in part, DENIED in part. By **October 4, 2022**, Defendant shall file his motion. By **November 1, 2022**, the Government shall file its response. By **November 15, 2022**, Defendant shall file his reply, if any. Time is prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), from today's date, **August 2, 2022**, through **October 4, 2022**, because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will allow time for defense counsel to file motions.

SO ORDERED.

Dated: August 2, 2022  
New York, New York

  
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ANALISA TORRES  
United States District Judge